

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	: CRIMINAL NO.
	: 1:01-CR-131
v.	:
	:
SYNEDO MICHAEL WILLIAMS	: (Judge Rambo)
	: Electronically Filed

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE OBJECTIONS TO PRE-SENTENCE REPORT**

AND NOW, this 3rd day of April, 2007, comes the above-captioned Defendant, Synedo Michael Williams, by and through his counsel, Robert J. Daniels, Esquire, and respectfully requests this Honorable Court grant an extension of time in the above-captioned matter, and in furtherance thereof avers the following:

1. Objections to the Pre-Sentence Report in the above-captioned matter are due by April 5, 2007.
2. The Defendant currently resides in Ontario, Canada.
3. Counsel and Defendant are still attempting to schedule a face to face meeting and have not had the opportunity to review the Pre-Sentence Report.
4. The Pre-Sentence Report is an expansive document that includes references to several dozen persons and involves a sophisticated criminal enterprise. While undersigned counsel has reviewed the Pre-Sentence Report, there are remaining issues that must be researched and investigated.

5. Accordingly, additional time is needed.

6. Counsel for Defendant spoke with Assistant U.S. Attorney Christy Fawcett, and Attorney Fawcett concurs with this request.

7. Assistant U.S. Attorney Fawcett also indicates that the government is still in the process of attempting to contact witnesses which could have a bearing on the Defendant's sentencing.

WHEREFORE, it is respectfully requested that a thirty (30) day extension of time be granted to respond to the Pre-Sentence Report in the above-captioned matter.

Respectfully submitted,

KILLIAN & GEPHART, LLP

Dated: April 3, 2007

s/ Robert J. Daniels
Robert J. Daniels, Esquire
Attorney I.D. #83376
218 Pine Street
P. O. Box 886
Harrisburg, PA 17108-0886
(717) 232-1851

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CERTIFICATE OF CONCURRENCE

The undersigned has contacted Assistant U.S. Attorney Christy Fawcett, who has indicated that she concurs in this Motion For Extension Of Time.

Respectfully submitted,

KILLIAN & GEPHART, LLP

Dated: April 3, 2007

s/Robert J. Daniels
Robert J. Daniels, Esquire
Attorney I.D. #83376
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CERTIFICATE OF SERVICE

I, Robert J. Daniels, of the law firm of Killian & Gephart, do hereby certify that I forwarded a true and correct copy of the attached Unopposed Motion For Extension Of Time by the Middle District Court's Electronic Filing System on April 3, 2007, to the following:

Christy Fawcett, Esquire
Assistant U.S. Attorney
U.S. Department of Justice
228 Walnut Street, Suite 220
P.O. Box 11754
Harrisburg, PA 17108-1754

Respectfully submitted,

Dated: April 3, 2007

/s/ Robert J. Daniels
Robert J. Daniels, Esquire
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Harrisburg, PA 17108
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